

# Consumer Vulnerability Strategy 2024



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## Acronym Key

AI	Artificial Intelligence
APPCOG	All-Party Parliamentary Carbon Monoxide Group
BSL	British Sign Language
CO	Carbon Monoxide
CSIWG	Customer Safeguarding Industry Working Group
EPC	Energy Performance Certificate
DNO	Distribution Network Operators
GDPR	General Data Protection Register
GDN	Gas Distribution Network
GSoP	Guaranteed Standards of Performance
MP	Member of Parliament
MS	Member of the Senedd
NEA	National Energy Action
PEA	Project Eligibility Assessment
PSR	Priority Services Register
SROI	Social Return on Investment
VCMA	Vulnerability & Carbon Monoxide Allowance

### Legal Notice

This paper forms part of Wales & West Utilities Limited Regulatory Business Plan. Your attention is specifically drawn to the legal notice relating to the whole of the Business Plan, set out on the inside cover of The WWU Business Plan. This is applicable in full to this paper, as though set out in full here.



# 1. A message from David Robinson, Business Services Director

We pride ourselves on providing an exceptional level of customer service to all our customers and resolving complaints quickly and efficiently. Identifying those customers who may need some additional tailored support in communications with us, or during our work, goes hand in hand with this.

In recent years, the UK economy has been impacted by the Covid-19 pandemic, the war in Ukraine, and the resulting cost-of-living crisis. Energy price rises over the past two years have influenced a huge increase in the number of our customers in fuel poverty. The UK has seen the overall energy customer bill debt increase from £1.5 billion to over £3 billion in this time. This also increases the risk of customers not being able to afford servicing for their gas appliances which can lead to gas leaks or risks of carbon monoxide exposure.

We work in partnership with charities and groups representing some of the most vulnerable people in our communities, to help make a positive impact on their finances and support them in other ways. Our partners help people to access benefit entitlements, provide support to access appropriate energy and water tariffs and have conversations with their suppliers about debt and direct debits. They can offer energy efficiency advice and link people to funds for insulation and new appliances, explaining the risks of carbon monoxide and providing alarms to those most at risk.

The UK is preparing to transition to low carbon energy, and gas networks have a key role to ensure that the most vulnerable customers are engaged and can benefit from cleaner energy in a way that's equal to the rest of society. Our colleagues including our engineering workforce as well as our partnerships, will support us to play our part in helping customers access cleaner energy and we all share a vision of how being in a warm and safe home can benefit the health and wellbeing of our communities and society.

## 2. Introduction: Our Consumer Vulnerability Strategy

At Wales & West Utilities, it's our responsibility to transport gas to homes and businesses in Wales and the South-West of England, through our network of pipes. We don't sell gas. We look after our pipes and assets to keep the gas flowing safely and reliably.

The area we serve is a mixture of cities, towns, villages, and open countryside. While much of our gas network is out of sight and underground, our services are easy to see in the everyday lives of our customers. Whether a safe and reliable gas supply heats a home or business, powers an oven to cook the family meals or warms the water for a nice hot bath, we understand how important it is for our services to be there when our customers need them.

### Here are some of our key facts:

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We own and maintain over 35,000km of gas pipes

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Supplying 2.5 million households and 100,000 businesses

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680,000 homes are on the Gas Suppliers Priority Service Registers

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Serving 7.5 million people

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Operating from North Wales to South Cornwall, covering one sixth of the UK

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There for our customers 24/7, 365 days a year

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## Our obligations

As a regulated business, our license agreement requires us to identify customers in need of extra support; to provide services such as a choice of communication channels and formats; and to keep customers warm during an interruption to the gas supply. We also need to demonstrate our services are fair to all.

Those customers in need of extra support, in vulnerable situations, or most at risk, are the group we refer to as priority customers — and it's our ambition to provide these individuals not only with mandated services, but also with tailored help that goes above and beyond our obligations.

### Identifying vulnerability during our work

The personal circumstances and characteristics that determine a priority customer's need for support could relate to disabilities, age, or finances, whether temporary or permanent. It's crucial that our colleagues on the ground are trained to spot when customers might need additional support. Vulnerability can come in many shapes or forms, and quite often people will have several vulnerabilities that lead to complex situations. Working on site at the homes and businesses of our customers is an essential part of our everyday and we want to make the most of this opportunity to be there for them. Unlike work on the electricity supply that can often be carried out remotely, the nature of gas supplies means we enter approximately 100,000 homes and businesses each year to keep our customers connected to the services they need. This creates opportunities to identify for the first time, customers who are in a vulnerable situation and not previously known to their supplier, water or electricity company.

### This work includes the following:

- Laying and altering 8,000 services
- Replacing over 400km of iron mains with new - durable plastic pipes - impacting 30,000 homes
- Attending 65,000 gas leaks, with 70% being in customers' homes

Since Covid, we have seen the number of households in fuel poverty within our region increase dramatically. We have witnessed that many people cannot maintain gas appliances due to record energy prices and cost of living pressures. Some of the ways we are going above and beyond our core responsibilities to address these situations; is by helping to make energy more affordable, by working with consumer groups to support customers with serious health conditions and disabilities, and by promoting gas safety including carbon monoxide awareness.

Recognising our skills and capabilities is an important part of our work with vulnerable customers, which is why we have developed trusted partnerships with charities and organisations that are best placed to help when we encounter support needs outside of our expertise.

### We define a priority customer, as:

'Anyone who due to their personal circumstances and characteristics needs support before, during or after our work and could benefit from additional services provided via our partnerships.'

## How we developed our strategy

Here at WWU, we published our Sustainability Strategy in July 2023, with a plan up to 2050. This included benchmarking of our commitments and ambition to compare our position in the industry, and to identify where we can make improvements. Internal and external stakeholders have been key to evolving this strategy, a copy of which can be found on our website: [sustainability-strategy-2023.pdf](#)

Environmental and Social Governance (ESG) forms a key part of our evolving management system. This set of standards helps us measure our company's impact on society and the environment, and ensures all our policies, processes and practices are guiding our business in the right direction.

As we prepare for the future, the gas networks are looking at the part which low-carbon hydrogen will play in replacing natural gas; to support industry and businesses; to offer choice to customers, and to deliver a dependable system that's fit for the purpose and times.

A clear Consumer Vulnerability Strategy is central to the success of our RIIO-GD3 submission document. It provides a logical direction and a narrative around all our actions, activities, and initiatives. In addition to this it offers a focus which our colleagues and partners can rally around, but most importantly, it is designed to enable our business to deliver the support that our priority customers want and need in cost-effective and efficient ways.

We have developed this strategy by gathering insights from stakeholder engagement and literature reviews; to evolve and combine both our Vulnerability and Vulnerability and Carbon Monoxide Allowance (VCMA) strategies previously published in RIIO-GD2.

We used a range of methods to engage relevant stakeholders, gathering insight about the services and support that can make a positive difference to our priority customers (or customers in vulnerable situations). This included:

- Deliberative engagement with our Citizens Panel
- Hybrid workshops with regional representative stakeholders such as charities and housing associations
- Regular meeting with key partners such as Care & Repair Cymru, SCOPE, Neighbourhood Energy Action
- In-depth qualitative research with consumers in vulnerable situations
- Participation in relevant all-party groups (CHECK) including the All-Party Parliamentary Carbon Monoxide Group (APPCOG) and the Welsh Government Fuel Poverty Group (check)
- Participation in industry vulnerability and debt focussed events.

This was supplemented by secondary research and literature reviews including the Ofgem Consumer Vulnerability Strategy.

### 3. Our Commitment to Customer Service

Providing customers with a high quality, reliable service is core to why we're in business, and to every part of our operation. The work we carry out to protect vulnerable consumers is a piece of our wider customer service strategy, and examples of our commitment to customer service are showcased in the graphic below.

#### Examples of our commitment to high quality, reliable customer service

A customer can expect an interruption to their gas supply just once every 40 years, as a result of our work to make sure the gas network is highly reliable.

Our gas emergency service attends gas escapes within 1-2 hours if the escape is controlled.

Each year, we train customer facing staff and engineers to identify and support vulnerable consumers

Customer performance reviews are discussed in board level meetings through to local manager meetings.

Asking internal and external stakeholders for their input is part of our every day.

Our freephone call centre number gives customers the option of a supportive conversation with a real person, in addition to the self-service tools available.

Customer Support Officers on the ground help operational colleagues to support customers before, during and after planned work and incidents.

Our website has been given the Scope AA standard for accessibility.

Customer satisfaction scores are above 9/10 for all types of work.

We resolve 83% of complaints within one working day of logging them.

We automatically pay customers compensation when things have gone wrong under our guaranteed standards of performance

We are accredited by the Institute of Customer Service (ICS) and the International Organisation for Standardisation (ISO).

## 4. Key challenges in Consumer Vulnerability

### Identifying vulnerability

Supporting vulnerable customers is core to our approach to working in communities across Wales and South West England, it is vital that we can identify customers that may be impacted by an interruption to the gas supply, or a change to business processes. We gather the information we need via the Gas Suppliers Priority Services Register (PSR), the Office of National Statistics, and our specially trained frontline staff. To us, quality vulnerability data describes information that stays up to date with the person, not the property. Our ability to offer the wide range of services we have developed with our stakeholders is dependent on the quality of data available on the PSR, and how easily it can be accessed.

#### Key stats<sup>1</sup>:

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24% of people in the UK have at least one disability.

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28% of homes within our region are on the PSR.

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Disabled households have higher energy costs than non-disabled households.

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England has an aging population with 11 million over 65s in 2023. This figure is projected to increase by 10% over the next 5 years.

### Safety

Ensuring customers are safe in their homes is a crucial part of our work, and so we make carbon monoxide protection and awareness a priority. Carbon monoxide (CO) is released when any fossil fuel does not burn correctly. This results in a gas that while invisible and odourless, can cause nausea, sickness, headaches — and death. Even though modern appliances and flues are much safer than older models, cost of living pressures can mean appliances don't get serviced as often, therefore raising the risk of CO. Many homes do not have a CO monitor, and many individuals are unaware of the risks, signs and symptoms.

#### Key stats:

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5,500 CO calls are received by Wales & West Utilities each year.

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Across England and Wales each year, 4,000 people go to accident and emergency, 200 people are hospitalised and there are around 50 deaths – due to CO poisoning.

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Social and private landlords have an obligation to install and maintain CO alarms in their properties.

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42% of homes in the UK do not have a CO alarm fitted<sup>2</sup>.

<sup>1</sup> Unless otherwise stated in this chapter, stats obtained from: Ofgem (2024) Consultation: Consumer Vulnerability Strategy Refresh. Available at: [https://www.ofgem.gov.uk/sites/default/files/2024-09/Consumer\\_Vulnerability\\_Strategy\\_Refresh\\_Consultation\\_paper\\_September\\_2024.pdf](https://www.ofgem.gov.uk/sites/default/files/2024-09/Consumer_Vulnerability_Strategy_Refresh_Consultation_paper_September_2024.pdf) Accessed 19.11.2024.

<sup>2</sup> Ian Hoey, International Fire & Safety Journal. Available at: <https://internationalfireandsafetyjournal.com/survey-reveals-42-of-uk-homes-lack-carbon-monoxide-alarms/> Accessed 01.10.2024.



## Fuel Poverty

A warm, safe home reduces the risk of health conditions developing or becoming worse. Research also shows that it reduces damp and its associated risks. However, many people today are cutting back on heating or are self-disconnecting due to cost increases of gas, the cost-of-living crisis, and record debt levels. This follows years of good progress in insulating homes and upgrading appliances.

### Key stats:

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13% of households in England are in fuel poverty.

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It is estimated 40% of households in Wales are in fuel poverty.

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As of October 2024, the UK consumer energy debt was £23.7bn.

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31% of adults in Wales have found it difficult to pay for their energy in the last year, compared to 27% in Great Britain. For those on a low income, this rises to 51%<sup>3</sup>.

## A Just UK Energy Transition

We take our role seriously as a GDN to ensure a just transition during the changes to the UK's energy system which lay ahead, and to make sure that everyone benefits equally from the transition to cleaner energy. Government decisions planned for 2026 on the use of hydrogen for domestic heating will determine what those changes will be, but it is certain that to meet legally binding climate targets, the UK needs to move away from fossil fuels such as natural gas, to low carbon solutions.

<sup>3</sup> National Energy Association. Available at: [https://www.nea.org.uk/news/oct-24-price-cap-wales-survey/#:~:text=Almost%20a%20third%20\(31%25\),households%20in%20fuel%20poverty3](https://www.nea.org.uk/news/oct-24-price-cap-wales-survey/#:~:text=Almost%20a%20third%20(31%25),households%20in%20fuel%20poverty3). Accessed 01.11.2024.

## 5. What is the Priority Services Register?

One of the ways we gather information to support priority customers, is through access to the combined Gas Suppliers Priority Services Registers — also known as the PSR. A free UK-wide service, it provides extra advice and support to customers on energy matters, including in the unlikely event of an interruption to the supply. When it comes to suppliers and networks, the PSR helps us to look after customers who need extra support with communication, access or safety, by tailoring services to better suit them.

### Benefits of registering on the PSR include:

- Receiving information in different formats such as large print, audio CD, braille, or through an interpretation service.
- Getting alternative heating and cooking services from the gas network operator in the rare event of a gas outage.
- Customers being able to nominate someone to deal with their bills or help with a power outage on their behalf.

### You are eligible for PSR Services if you:



Customers can join the PSR online or contact their energy suppliers directly, who can guide customers through the registration process. To talk to us further at Wales & West Utilities about the PSR, customers can contact us on 0800 072 6202 or email [priorityservices@wwutilities.co.uk](mailto:priorityservices@wwutilities.co.uk).

A summary of the PSR and the number of people registered each category can be found in appendix 1.

## 6. Our capabilities

To achieve our ambitions in consumer vulnerability, we will continue to build upon our focus that includes six key capabilities. Whether continuing to provide services to customers during our core works; or developing a project with partners to tackle fuel poverty, this model represents our approach. Using this, we can adapt and evolve our services to meet customer needs as we move from the present day through RIIO-GD3 and beyond.

### Supporting priority customers key capabilities

#### 1. Identifying vulnerability

Finding out who needs support, what kind and how to deliver this.

#### 3. Upskilling staff

It is essential that we give all staff who need it the relevant training and equipment to be able to recognise and respond to vulnerability.

#### 5. Delivering to priority customers

Going beyond our license agreements, we deliver tailored services to our priority customers.

#### 2. Understanding need

Using a variety of engagement methods, we take action to understand the needs of priority customers.

#### 4. Partnerships with trusted organisations

Working with partners to make sure priority customers get the support they need, from those best equipped to give it.

#### 6. Measuring the benefit

By regularly evaluating our support and services, we ensure they continue to improve and deliver value for money.

### 6a. Identifying vulnerability

Using the gas suppliers PSR database, insights from the Office of National Statistics, and local knowledge, we will identify priority customers, understand who needs support, and ensure we respond in the most suitable way for every individual.

Our reports and dashboards are from National Energy Action, Citizens Advice and the Institute of Customer Service.

To learn which customers might be experiencing fuel poverty, we consult the Welsh Government's Index of Multiple Deprivation. We also use tools that layer multiple sets of data, such as the NEA Egnida Vulnerability visualisation tool, that we developed with Network Innovation Allowance (NIA) funding to deliver our projects. Examples of maps showing fuel poverty levels, homes claiming disability allowances and housing Energy Performance Certificate (EPC) data are included in Appendix 2.

Statistics tell us that as the UK population ages and people face multiple vulnerabilities the number of homes registered on the PSR will continue to grow potentially reaching 40% of all households. When responding to incidents we will prioritise the most vulnerable. This will include those with needs codes relating to serious health conditions, young children, sensory loss and learning/comprehension challenges.

## 6b. Understanding need

Engaging with a wide range of people who have an interest and expertise in supporting priority customers is a crucial part of our approach. Those internal and external stakeholders will help us to identify the wants and needs of priority customers from varied standpoints, to ensure we achieve the bigger picture of the right support being offered through the right channels.

We identify the stakeholders who can provide valuable insight into the wants and needs of priority customers including:

- Charities such as Citizens Advice and Neighbourhood Energy Action
- Elected Members including local, devolved and national Government
- Expert group members such as the Customer Safeguarding Industry Working Group, Consumers living in vulnerable situations themselves, carers and colleagues who regularly come into contact with customers.

We then identify the most appropriate engagement method. This can include:

- Meetings including face to face and online, participation in groups, consultations; deliberative research, in-depth interviews and focus groups, quantitative research including online, telephone and face to face surveys such as willingness to pay, acceptability and prioritisation, stakeholder workshops and events (including face to face and hybrid), Panels.

The APPCOG helps us understand current need, trends in demands on services and to predict future need. Trusted experts and partnerships include our Independent Stakeholder Group (ISG) and Critical Friends Panel, which enable us to test our approach and commitments to further develop our services and ambition.

Joint network forums such as the Customer Safeguarding Industry Working Group (CSIWG) bring together network companies and suppliers to focus on serving vulnerable customers. We will also explore effective working for common goals with the Distribution Network Operators (DNO) and water companies in our area.

Two additional pieces of our engagement picture include our Citizen Panel and colleague insight. Our Citizen Panel is a group of informed customers from across our network, who we work with to test our commitments and to help develop our plans. As our colleagues live and work in our communities they have great insight into their needs, and so we draw upon their expertise.

## 6c. Upskilling Staff

Being proactive in identifying priority customers is part of our approach to consumer vulnerability as a GDN that drives outstanding customer service. To achieve this, we will make sure all staff who need it receive the relevant training required to recognise scenarios of vulnerability, as well as equipping them with the skills and kit to provide the appropriate response. In more detail, here's what we will continue to provide:

- Training of customer service team and priority customer team
- E-learning for the whole business
- Face to face sessions
- Priority customer week
- Equipping staff with scripts and access to information
- Tools for our engineers such as Language Line translation App
- Adequate supplies of heating, cooking, and hot water appliances

## 6d. Partnerships with Trusted Organisations

Our partnerships with a broad and diverse selection of trusted organisations support priority customers to get the services they need, from those with appropriate tools and expertise.

For the greatest impact in supporting communities, it is important we link with these organisations that best represent and support them. The result is co-created projects that are tailored for specific groups. Examples include our partnerships with Maggie's Cancer Centres, Kidney Network UK, NHS Wales, and carers groups such as Swansea and Bridgend Carers.

Where a partner project has the potential to have a wider UK reach, we will take proposals to the Gas Distribution Network (GDN) steering groups, to assess, support and assist in building a collaborative GDN project.

## 6e. Delivering to Priority Customers

Going beyond our license agreements is the right thing to do, so we will meet the wants and needs of our priority customers with tailored, value-for-money services. Being mindful of the support that is appropriate for a gas network, we will bring direct services to priority customers in their homes. We will also offer customer education in carbon monoxide safety, as well as training and educating our colleagues in how to identify and support vulnerability. Recognising the situations that our on-the-ground colleagues may encounter, they will be equipped with tools such as language translation services, additional training, skills to work on appliances, and to carry out additional checks for carbon monoxide.

Further detail about the services we provide to customers can be found in sections 7 and 8.

## 6f. Measuring the Benefits

Evaluation is a key part of our approach, so that we can measure the benefits of the support we deliver and assess how this can evolve, in addition to consistently delivering value for money. See section 13a for more information on how we measure our work.

Further detail on organisations we are currently working with and the outcomes for customers can be found in our VCMA reports on our [website](#).



## 7. Supporting Customers During our Core Activities

As a Regulated Gas Transporter, we have several licence conditions that mean we must identify priority customers and offer them additional services in terms of communication, accessibility, and protection during gas supply interruptions. We also have a requirement to treat all customers fairly and not to exclude people from access to services.

This is a mature area of our business that has been in place for ten years. We continue to test the services with stakeholders every year and we are always looking for innovation and best practice to further evolve.

**The following services and actions show our commitment to supporting priority customers as part of our business-as-usual operations:**

Service	What we do	RIIO-GD3 Evolution
<b>Stakeholder engagement</b>	Includes Citizens panel, regional stakeholder events, GDN best practice forums, engagement with electricity and water companies, literature review, internal meetings and process/performance reviews	Closer working with DNOs and water companies
<b>Work with consumer groups</b>	SCOPE and NEA membership Regular engagement with Citizens Advice Network of partnerships from the health and third sector	Developing additional relationships with consumer groups and governments.
<b>Hardship Fund</b>	Dedicated money ringfenced to support customers who require essential support when their gas supply has been interrupted and they do not qualify for support with partners	Development of social fund outside regulatory constraints to provide additional support to customers
<b>Priority Service Register referrals</b>	Promote the benefits of the PSR with a range of channels for customers to join who are eligible. Primary referrals to the Distribution Network Operators. As a result, the data is also shared with suppliers, and Water Companies, creating an informal common PSR	Ongoing work with Ofgem and Ofwat to evolve the PSR and potentially create one PSR for the utilities sector incorporating Department of Work and Pensions (DWP) data
<b>Communications</b>	Freephone number Large font, translation services BSL and Translation Apps for Engineers Accessibility tools on website	Integrate Artificial Intelligence (AI) to improve the customer experience
<b>Priority Customer Team</b>	Dedicated support team to engage with priority customers and to provide safeguarding advice to our engineers	Increase knowledge to evolve with need and demand

Service	What we do	RIIO-GD3 Evolution
<b>Customer Satisfaction Surveys</b>	Specific customer satisfaction surveys for PSR customers across emergency, replacement and connections activities	We will also report PSR customer complaint performance in RIIO-GD3
<b>Colleague Training</b>	Ensure operational and office colleagues receive training to support priority customers	Incorporate energy transition advice in to training for RIIO-GD3
<b>Free alterations</b>	Move the meter to a suitable location to allow access to the ECV and meter for customers with physical disabilities	Continue with expected increased demand due to ageing population
<b>Enhancing Support During Interruptions</b>	Provide temporary cooking and heating appliances during supply interruptions. In addition, we can offer hot water, showers, food vouchers and alternative accommodation as tailored support	Innovation projects to enhance ways we can support customers during interruptions
<b>Fair Treatment of Customers</b>	Licence Obligations External verification via annual ISO22458 Kitemark for Inclusive Service provision	Co-creation and testing of services with consumer groups and customers with a range of vulnerabilities
<b>Guaranteed Standards of Performance</b>	Compensate customers when we fail to deliver a level of performance: Notification of planned works Provision of alternative heating and cooking to PSR customers Reinstating private land within 3 working days for PSR customers Compensation for being off gas > 24 hours Connections quotations, planning and gas on timelines	Target a reduction in failures through process reviews and better use of data. Working with operations to provide coaching and support during work activities.
<b>Fuel Poor Extension Scheme</b>	Vouchers to fund to first time connection to the gas network to tackle fuel poverty	Scheduled to end 31st March 2026 Replace with other fuel poverty advice Funding from VCMA to tackle fuel poverty, and support customers in a just UK energy transition (see section 8)

## 8. Our Proposed Use of Vulnerability and Carbon Monoxide Allowance

The Vulnerability & Carbon Monoxide Allowance (VCMA) enables the Gas Distribution Networks (GDNs) to deliver additional services and initiatives to support vulnerable customers. This section details how we carefully spend this funding to create a positive Social Return on Investment — we talk more about SROI in section 13 — as well as using it to support to those most at risk of being left behind in the transition to net zero.

### What is it?

At the start of RIIO-GD2, the original VCMA funding of £60m was made available to the GDNs. Each GDN has been allocated an amount of the allowance based upon the proportion of gas consumers it supplies. Our share at WWU is just under 12%, equating to £7m. At least 25% of the allowances must be spent on collaborative projects.

Reallocation of allowances from the Fuel Poor Network Extension Scheme to the VCMA in July 2023 increased the overall VCMA funding to £171m. Each GDN will be allocated a proportion of the additional allowance, which is £111 million. This will be adjusted in line with inflation, and our overall allowance has now increased to £20m.

While funding for the VCMA in RIIO-GD3 is yet to be confirmed, stakeholders are very supportive of the level of funding continuing at the RIIO-GD2 level. This would allow us to maximise our reach and the number of customers benefiting from our services. This will be reflected in our Business Plan for RIIO-GD3.

### How do we use it?

VCMA is a 'Use It or Lose It' (UIOLI) Allowance and must be used between April 2021 and March 2026, within RIIO-GD2. As a responsible GDN, we must be able to demonstrate that the money has been well spent, with a positive Social Return on Investment (SROI) which targets those most in need. Projects are registered with Ofgem through Project Eligibility Assessments and annual reporting; while showcase events allow us to demonstrate our strategies and show how the money has benefitted customers.

Ofgem require at least 25% of the allowance to be spent through collaborative projects with at least one other GDN.

We strive to own a portfolio of projects that meets the population and needs of our four geographical areas:

- North Wales
- South Wales
- South-West (Cornwall, Devon and Somerset)
- Central (Bristol, Gloucestershire and Wiltshire)

Our VCMA funding enables us to deliver the following key projects and services to customers.

## Fuel Poverty and Energy Affordability

This funding allows partners to provide fuel voucher support to customers so they can keep the heating on in the short term. It also enables further discussions with our specialist colleagues and project partners, which can lead to changes in customer situations in the long term — such as accessing benefits or being supported by partner organisations.

**Within this project we can offer the following help and support:**

### **Keep warm packs**

The packs help to keep a person warm if they are worried about the cost of switching the heating on or running appliances. A pack contains: a hot water bottle with fleece cover, blanket, thermometer, thermal socks, gloves, thermal hat, leaflet, disposable hand warmer and thermal mug.

### **Accessing unclaimed benefits**

Through partner organisations we can help assess customer eligibility and help guide them through the process.

### **Reviewing energy debt**

Through partner organisations we can help customers review their direct debit payments and any energy debt.

### **Funding for energy efficient measures**

In collaboration with partner organisations we can help customers to find out whether they are eligible, and how to apply.

### **Energy behaviour advice**

This could give help such as understanding boiler and radiator controls, helping the customer save costs and increase efficiency.

## Services Beyond the Meter

This describes the services we put in place when we find customers with faulty appliances or pipework during our work, and they are at risk of being without gas due to costs or the capacity to deal with the issues. In these cases, the VCMA governance allows us to either repair with our trained engineers or refer to partnerships for proactive servicing of appliances via Gas Safe Engineers. However, support is currently limited to those customers on means tested benefits and therefore some customers on low income and in poor health may not be eligible for support. We will continue to engage with Ofgem and other GDNs to review the criteria and ensure people are not left in cold homes.

## Supporting Priority Customer groups

Our programmes titled, 'supporting priority customer groups' are targeted at helping customers who are eligible to join the PSR. Through accessible support we can help some of the most disadvantaged communities across our network remain safe and warm in their own home.

- We carry out projects with charities and organisations that represent specific groups. These include SCOPE (disability charity), Care & Repair Cymru, Kidney Care UK, Maggie's Cancer Trust, Marie Curie, MS Society and Mental Health UK.
- We raise awareness of the benefits of being on the utilities PSRs and actively sign people up through our engineers, customer service colleagues, our partnerships and through social media campaigns. We share this information, and through referrals to DNOs, who in turn share the referrals with water companies and energy suppliers.
- A locking Cooker Valve is a simple safety device that we can fit to existing gas pipework, removing the risk of a cooker being accidentally left on or turned on, giving peace of mind to family members or carers that the cooker can't be used when they are not present.

## Carbon Monoxide Awareness

Our CO awareness programmes are designed to help raise awareness of the dangers of CO, remind people how to stay safe and to help communities understand the impact CO can have on different vulnerabilities and age groups.

- We carry out CO safety and awareness in customer homes.
- We undertake national campaigns in collaboration with the other GDNs.
- We provide free alarms including accessible alarms incorporating flashing lights, vibrating pads and links to wearable technology.
- Through our Gas Safety Ambassadors, we carry out schools and community education.
- We are training and equipping a number of our engineers to undertake additional checks for the presence of CO following emergency calls. This will enable us to switch appliances back on where there is no evidence of CO, or to pinpoint the source and exposure levels where CO is present.

## Going forward

As we move from RIIO-GD2 to RIIO-GD3 we will continue to provide the above range of services and maximise the value of the funding agreed with Ofgem. We will work with our partner organisations to review the projects developed in RIIO-GD2 and adapt these to customer need and maximise the reach of the funding while providing continuity of service. The VCMA services in RIIO-GD3 will also incorporate how we support customers in the UK energy transition which is expanded upon below.



## 9. Supporting a Just UK Energy Transition for our customers

During our move toward RIIO-GD3 from 2026 to 2031, we will be reviewing the VCMA services and governance with Ofgem, adding support to help customers through the UK energy transition to low carbon ways of heating the home.

As one of the many stakeholders, we will play our role in supporting the just transition with the following strategic aims.

	What we will do	Timeline
<b>Colleagues</b>	Educate with e-learning modules	2025
<b>Resources</b>	Information booklets developed collaboratively with partners and GDNs.	By the end of 2025
<b>Financial Assistance</b>	Refer to partners and independent companies.	Ongoing
<b>Tools</b>	Development of tools for customers and colleagues to understand the UK energy transition, and to get tailored advice for their home and communities	2025
<b>Energy Efficiency Measures</b>	We are looking into a potential tool/app for engineers. Some of our trusted partner organisations can help with energy efficiency, so we refer customers for support.	2026
<b>Consumer Education</b>	Target future bill payers through education in schools and of young adults. Educate households with their options.	2026
<b>Local Planning</b>	Communicate with other stakeholders. Support people in local communities. Support local hubs and drop-in centres with resources.	Ongoing
<b>Business Investment</b>	Ensure all investment considers customers.	In place

Our definition of a 'Just Transition' means playing our role as a GDN to:

Advocate to ensure no one, particularly those most at risk, is left behind or burdened as the UK transitions to cleaner energy.

Ensure everyone — despite where you live, social and economic status — benefits equally from the transition to cleaner energy and is aware of the choices they have available to them.

## Customers most at risk of being left behind

The GDNs have developed a joint definition:

‘Those experiencing a temporary or long-term situation which would impact the household in one or more of the following ways’:

- Low or static household income, which impacts on essential costs/energy affordability.
- Additional/unavoidable energy costs – specific need to stay warm at home (e.g. health issues).
- More susceptible to/at risk from the cold, elderly/mobility issues/unable to leave the house, or at home more frequently, expensive/ hard to heat homes, including those off the gas grid).
- Additional barriers to accessing or engaging in support (e.g. language or communication barriers (including literacy), lack of access to services, lack of social/support networks, socially or digitally excluded).

These are individuals typically signed-up-to the PSR or are eligible to be on the PSR.

# 10. Innovation that supports vulnerable customers and is good for all

Over the past twelve months of business, we at WWU have continued to accelerate our portfolio of innovation projects, spending £2.8m of innovation funding to support the energy system transition and vulnerable customers, in line with the UK government's 2050 net zero targets. We publish an annual Innovation Report, and as part of our RIIO-GD3 submission we will also publish an Innovation Strategy that will explore our innovation plans for 2026-2031 in full detail.

Because innovation is often the route to supporting priority customers, we see the importance of including an innovation section in our Vulnerability Strategy that recognises our work to meet needs beyond business-as-usual services.

Innovation for customers can be the development of new products and services, or taking something that already exists and adapting for it use within the business. While it may be a service that has been created with priority customers in mind, these are often supportive for all customers.

## **Examples of our innovation over the past five years:**

- Introduction of Language Line translation apps for our engineers.
- Integration of the gas suppliers' PSR data into our core systems.
- Temporary hot water for customers experiencing a gas interruption via urns, pop up showers and insulated carriers.
- Food vouchers during interruptions.
- Development of ramps and covers to protect the public at our street works.

## **Ongoing developments that we are involved in:**

- Strategic Innovation Fund (SIF) Hy-Fair project to develop a platform for customers and their representatives that helps guide them through the UK energy transition.
- The Egnida Vulnerability Data Visualisation tool is being developed as a single point of reference to help capture and measure vulnerability within a geographical area.
- Home Shield is a device that recognises in-home alarms, and alerts family and carers.

## **We have a number of focus areas for the future:**

- Adding customer and demographic data alongside asset data into our systems. Continuing to invest in our systems to ensure customer information is kept safe and secure.
- Developing digital services and communications while not losing sight of those customers that are digitally excluded.
- Developing appliances and products to keep customers warm during a gas supply interruption, with a focus on removing concerns about running costs for the customer.
- Tools to help navigate the UK energy transition for customers and the family member or carer that represents them.

# 11. Collaborative working with the UK GDNs

At Wales & West Utilities, we are among the UK's four GDNs that transport gas to homes and businesses through pipes that we own and manage. Each is regulated by Ofgem, and we all share a mostly common set of obligations that must be carried out, as well as Licence Conditions that must be met.



Over the past ten years, the GDNs have worked together to develop services for priority customers. We at WWU are committed to continuing this collaboration to share best practice, develop services, and establish joint projects that impact the gas customers of the wider UK.

The GDNs have developed a series of working groups that bring together specialists from the GDNs and external stakeholders. Each network chairs one of these groups, and their terms of reference is established and reviewed annually to set out ambition, aims, and steer focus to the right areas.

## GDN Working Groups in more detail

### **Customer best practice**

This is a forum to review customer satisfaction, complaints, and guaranteed standards of performance (GSoP). It aims to make sure there is consistency among GDNs, alongside sharing best practice. The group is responsible for the contract with our shared independent market research company which undertakes the customer satisfaction surveys.

### **Vulnerability group**

A forum of experts supported by invited third parties, this group takes the lead on our licence obligations to identify and support customers during our core works (emergency, planned and connections as well as our general enquiries). The group stays close to legislation changes that impact priority customers, plus the control of customer data under the General Data Protection Regulation (GDPR). Their remit also includes working with Ofgem and the wider utility industry to develop the PSR.

### **VCMA carbon monoxide group**

GDN experts on carbon monoxide awareness sit on this group, to focus on campaigns and engagement that has been informed by stakeholder engagement and research. They have a close working relationship with the APPCOG and the wider group of stakeholders in that forum, which allows for understanding of legislation, coordination of campaigns, and support for national carbon monoxide awareness week.

### **VCMA Vulnerability and fuel poverty group**

Consisting of GDN experts on the challenges that vulnerable customers face in the energy market and the causes of fuel poverty, this group works with external stakeholders to identify need and develop collaborative projects under the current VCMA guidelines. The intended outcomes are to reach vulnerable customers and tackle the root causes of fuel poverty.

### **VCMA steering group**

This group signs off collaborative projects with the support of key stakeholders including Citizens Advice and Network Entry Agreement. The group tracks budget and monitors delivery of projects to ensure customer money is being well spent. Members of this group are also the key contacts for discussions with Ofgem about the VCMA in RIIO-GD2 and, considering the future, in RIIO-GD3. The group take an approach to share information, data and insight wherever possible to ensure we are aligned in our ambition, while recognising that individual GDNs may have different approaches directed by their own stakeholders in terms of how outcomes are achieved.

### **External forums and support**

The GDNs jointly support a number of organisations through their forums and working groups, which include National Energy Action (NEA), and Scope's utilities members group. These forums give us additional insight into the issues faced by customers, and the opportunity to lend our support to other stakeholders in lobbying government to create support and change.

### **Joint engagement with stakeholders**

While each GDN engages independently with numerous local stakeholders, there is also benefit in seeking joint engagement with national stakeholders. The joint GDN engagement group allows us to engage with organisations such as Citizens Advice and National Energy Action on multiple topics such as priority customers, net zero, and the environment within one session. This is both beneficial to the third party and allows the same insight to be fed back to each GDN.

### **Innovation**

This is also covered in Section 10. The RIIO-GD2 mechanism for innovation encourages joint GDN participation in projects, and the sharing of project findings to all GDNs irrespective of their involvement. This is coordinated by the innovation teams within each GDN.

The GDNs have developed and published a collaborative vulnerability strategy that can be found [here](#).



## 12. Delivery and governance

As a licenced gas transporter, we are committed to maintaining and complying with industry codes, as set out in the conditions of our licence; and as a good corporate citizen, we are committed to going above and beyond these licence agreements to protect energy customers, with additional initiatives for priority customers. So that we successfully meet the high standards of operation that we set out to, our work in consumer vulnerability is held to account just as carefully as our work across the company.

**Here we detail the ways we will build in delivery and governance of our consumer vulnerability strategy in RIIO-GD3.**

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Annual review of core services through our Customer and Communities Steering Group, also taking into consideration feedback from stakeholder events.

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Procurement rules will be followed for tenders of equipment and services.

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Projects will be approved using the WWU Delegated Authority Matrix, with the Executive team approving projects over £250k.

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Projects will be managed by the VCMA team reporting to the head of Customer and Social Obligations, to include a minimum of quarterly meetings with partners.

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The Customer and Communities Steering Group will review projects and outcomes, plus regularly review and develop our strategy.

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We will hold regular updates with our ISG on strategy and delivery.

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Annual reporting will be subject to the Data Assurance Guidance controls. Data tables and reports will be subject to review by a second person, internal experts, internal audit, and signed off by a responsible Executive member.

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## 13. Evaluation and reporting

It is critical to our consumer vulnerability work that we evaluate and report on our initiatives. This allows us to identify where our projects are achieving their objectives and find out areas for improvement.

We will publish an annual report to outline the support we have established for priority customers, in addition to our VCMA activities, outcomes, and benefits. We will also publish a collaborative GDN report each year and hold an annual showcase event.

### **Our reports and event will include the following pieces of information.**

- Insights from our stakeholder engagement activities.
- Details of services provided, alongside their reach and awareness.
- External verification.
- The financial savings we have achieved.
- Lived experiences/case studies that demonstrate positive impact on wellbeing and mental health.
- To test whether the way we identify, and support vulnerable customers not only meets our Licence Obligations, but is best practice, we undergo an annual external audit against the ISO22458 Inclusive Service standard. We will confirm annually that we have retained this standard and any non-conformities that we will be working to close.
- Customer Satisfaction scores including PSR customer satisfaction.
- Any complaints received, recorded in our report on PSR for RIIO-GD3.
- How we measure according to our Guaranteed Standards of Performance.
- The number of PSR referrals we have received.
- We will report on how the number of customers on the PSR has changed compared to the previous year. We can then link this change (usually a higher number) to our initiatives, to promote and sign people up to the energy suppliers' PSRs.
- Fuel Poor network Extension Scheme connections (to the end of RIIO-GD2).
- The number of free alterations we have carried out to home or business gas supplies.
- Volume of alternative and heating appliances provided.
- The number of Keep Warm packs we have provided.

# Social Return on Investment

SROI is a recognised method of assessing the investment made in a project, against the wider benefit to society. It is important to us at WWU that we fulfil our values as a responsible GDN; and to verify our impact, we must have a quality means of measuring it.

The UK government has created guidance for assessing SROI in the UK, called The Green Book. It supports in depth consideration of the costs, benefits and trade-offs of alternative options such as SROI, for meeting policy objectives.

## Our model

The model we use to measure our social return on investment, was built by strategists Sirio, under a contract with the Energy Networks Association. It was built to be delivered by 2024, for use by Gas Distribution Networks, Distribution Network Operators, and Transmission. As a group of GDNs, we are committed to working toward a consistent measurement of social value across the energy industry. We believe that this piece of work will encourage and support our shared ambition in this space. A GDN rulebook has been developed to allow consistent evaluation of core services under the VCMA and via different delivery channels.

Each Project Eligibility Assessment (PEA) includes a forecasted SROI which we then compare against the actual SROI based on the outcomes generated by the project.

## Social and financial benefits of the VCMA

Providing a Fuel Voucher to keep the energy flowing	Reducing energy bills through tariffs, energy efficiency advice and accessing finance for insulation	Reducing visits to doctors linked with cold homes	Reducing visits to doctors linked with carbon monoxide
Reducing hospital stays	Reducing serious injury from carbon monoxide	Reducing and preventing deaths from carbon monoxide	Reducing stress and improving mental health
Reducing reliance on care professionals	Identifying unclaimed benefits	Accessing Warm Homes Discount payment	Tackling energy debt



## Our SROI strategy

Still a relatively new method in WWU, we have used SROI on a small scale to assess the forecast and check the actual delivery of projects — and we intend to use it on a wider basis to assess business outcomes.

We are therefore planning to expand the knowledge within our business and train two people by 2026 to be competent SROI assessors with a recognised qualification. In collaboration with the other GDNs and network companies, we will migrate the SROI tool from Excel to a more suitable platform which simplifies the inputs and creation of a project.

We are involving our partners in the use of SROI measurement which will enhance how they measure projects outcomes and boost their chances of winning future funding bids.

## Other measurements

Using numerous methods to measure our performance, quality, and areas for growth, allows us to see an in-depth picture of our situation and gives us the opportunity to further improve our services for priority customers. The additional means of measurement and benchmarking that we use are as follows.

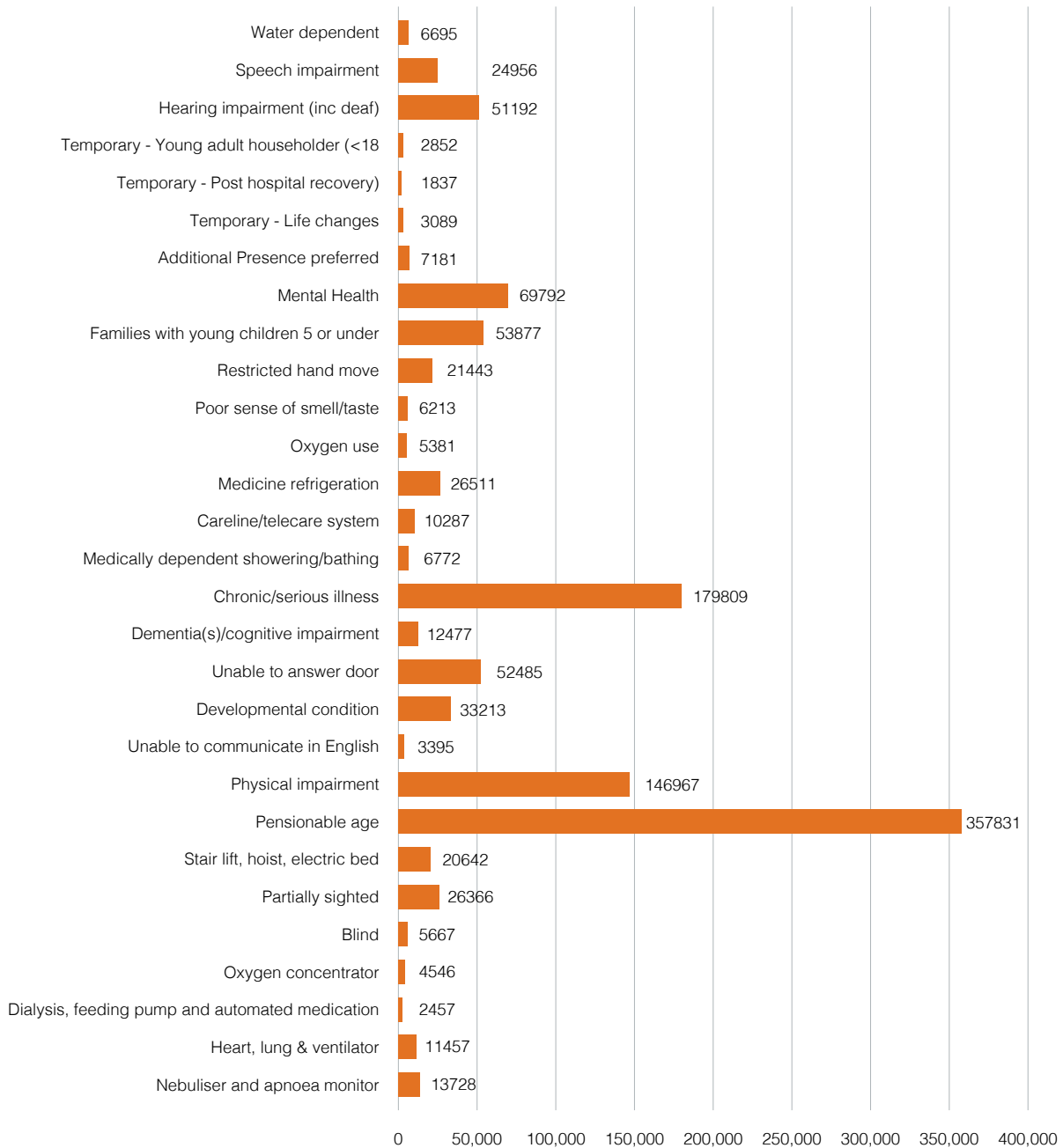
- Case studies
- Customer surveys
- External recognition and sentiment analysis

## Benchmarking

- Delivery of outcomes for customers across our area — normalised by population
- Against other GDNs
- Against DNOs and Water

# Appendix 1

## Summary of PSR customers and categories

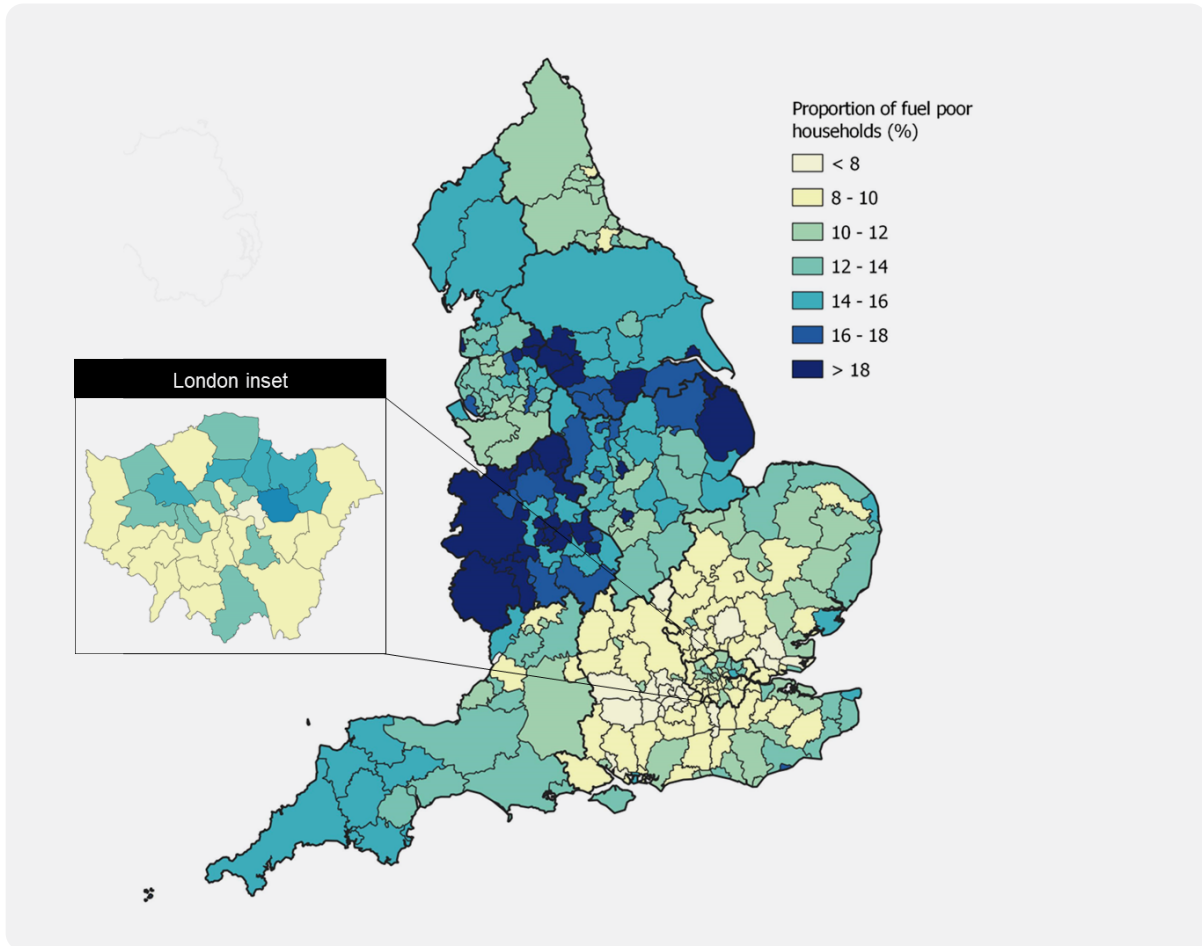


# Appendix 2

## Examples of datasets and maps used to identify need

### Fuel Poverty England

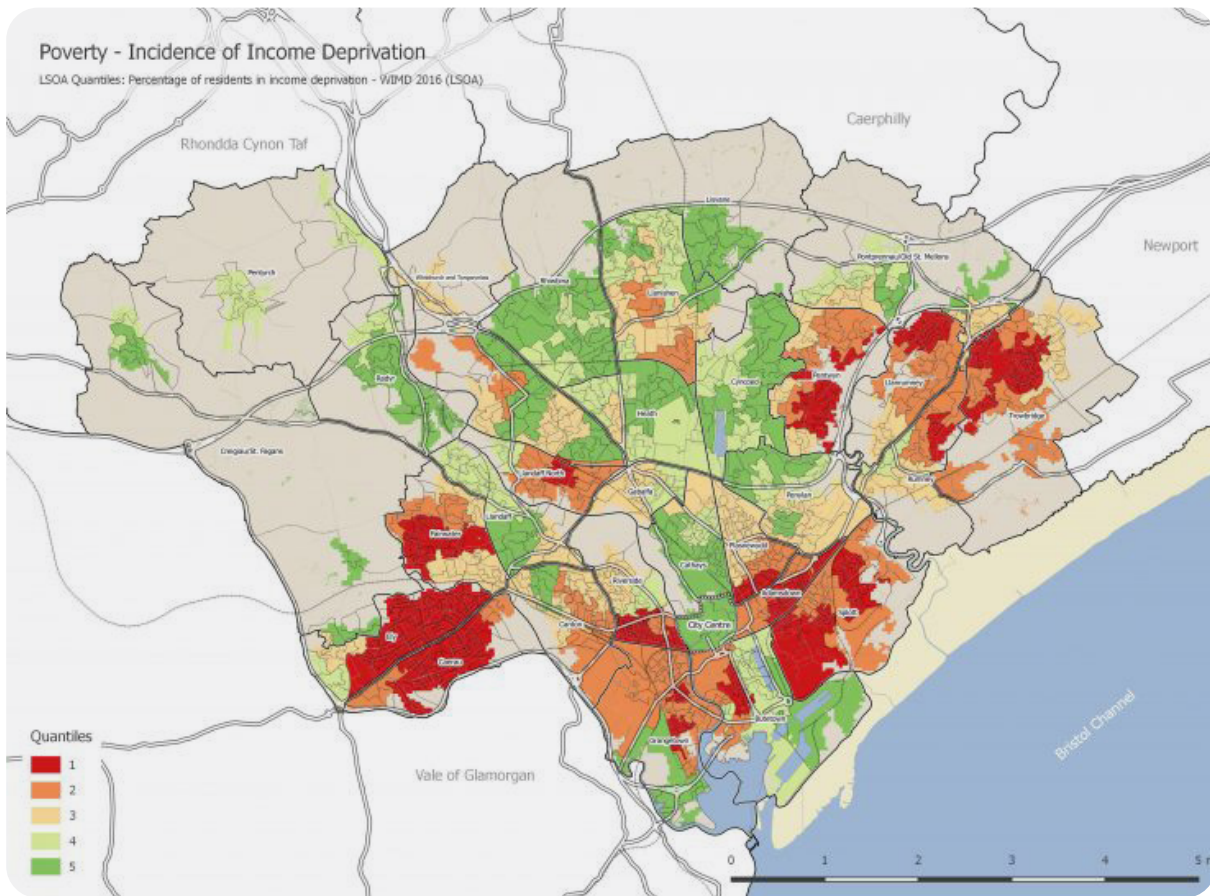
Examples of ONS data showing fuel poverty at a regional level across England. Highest levels in Cornwall and East Devon and along the English / Welsh Border (mostly Cadent area)



Sub-regional fuel poverty in England, 2024 (2022 data) - GOV.UK

## Fuel Poverty at Lower Super Output Area

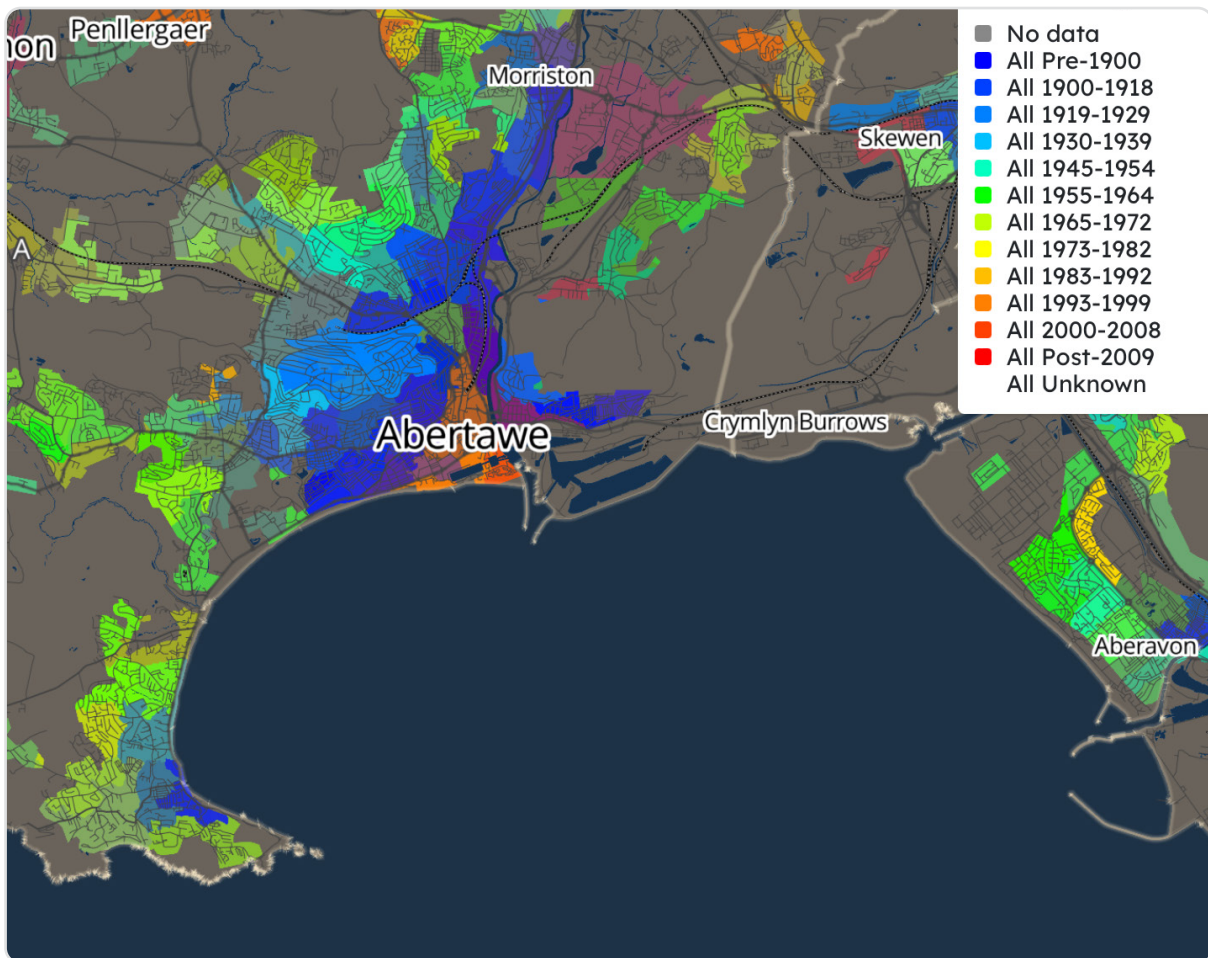
Example of Welsh Government data showing Fuel poverty at Lower Super Output Area (LSOA) level in Cardiff showing communities around the city centre most impacted but also communities to the West.



[www.warmwales.org.uk](http://www.warmwales.org.uk)



## Housing Age – Swansea



Dwelling Ages and Prices | CDRC Data